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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DISTANT SEA JARAMILLO,)	Case No. 1:22-cv-01254-EPG
)	
Plaintiff,)	ORDER RE: STIPULATION FOR
)	EXTENSION OF TIME
vs.)	(ECF No. 14).
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 17, 2023 to June 16, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of April 17 2023 and April 24, 2023, Counsel currently has 12 merit briefs, and several letter briefs and reply briefs. This includes cases that undersigned counsel took on during co-counsel's, Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly brief this matter for the Court.

1 Counsel for Plaintiff is currently taking partial leave as his child was born on October 14,
2 2022. Thus, Counsel is working limited hours.

3 Additionally, Counsel underwent major surgery on March 15, 2023, requiring post-op
4 physical therapy, with the need for several breaks throughout the workday.

5 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
6 and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: April 3, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

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12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff

15 Dated: April 3, 2023 PHILLIP A. TALBERT
16 United States Attorney
17 MATHEW W. PILE
18 Associate General Counsel
19 Office of Program Litigation
20 Social Security Administration

21 By: */s/Jamala Edwards
22 Jamala Edwards
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on April 3, 2023)
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ORDER

Based on the parties' stipulation (ECF No. 14), Plaintiff shall have until June 16, 2023, to file a motion for summary judgment.

IT IS SO ORDERED.

Dated: **April 4, 2023**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE